## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANGEL S. OLDEN-COE	)	
P.O. Box 2142	)	
Joliet, Illinois 60434	)	
	)	
Plaintiff,	)	Case No. 08 CV 3066
	)	Judge Kendall
vs.	)	Magistrate Judge Brown
	)	
TACO BELL CORP., MARY BEYER,	)	
and JACQUES T.,	)	
	)	
Defendants.	)	

## AGREED MOTION FOR AN EXTENSION OF TIME TO FILE AN ANSWER OR OTHER RESPONSIVE PLEADING

Defendants Taco Bell Corp, Mary Beyer and Jacques T., by their attorneys, respectfully request that the Court extend the time within which each Defendant must file its answer or other responsive pleading in the above-captioned case by three weeks. In support of this Motion, Defendants states as follows:

- 1. Pursuant to the Court's Order, Defendants' answer or other responsive pleading currently is due on July 23, 2008.
- 2. The individual Defendants, Mary Beyer and Jacques T., anticipate filing a Motion to Dismiss. Taco Bell anticipates answering part of the complaint and filing a Motion to Dismiss part of the complaint for failure to state a claim.
- 3. Counsel appointed for Plaintiff has told Counsel for Defendants that he reasonably anticipates seeking leave to file an amended complaint within the next few weeks.
  Defendants do not anticipate opposing this request.

4. Extending the time for Defendants to answer or otherwise plead will allow

Plaintiff time to file an amended complaint and may thereby obviate the need for Defendants to

file motions to dismiss or to answer a complaint that presumably will be supplanted by an

amended complaint in short order.

5. This is Defendants first request for an extension of time to file its answer

or other responsive pleading in this matter and the request should not unduly delay the

proceedings or prejudice any party. Counsel for Plaintiff agrees to Defendants request herein.

WHEREFORE, Defendants Taco Bell Corp, Mary Beyer and Jacques T.

respectfully request that this Court grant this Motion and extend the time within which each must

file its answer or other responsive pleading by three weeks, to and including August 13, 2008.

Respectfully submitted,

TACO BELL CORP, MARY BEYER, and

JACQUES T.

By: /s/Julie O. Allen

One of Their Attorneys

Julie O'Donnell Allen SIDLEY AUSTIN LLP One South Dearborn Street Chicago, IL 60603

Telephone: (312) 853-7000 Facsimile: (312) 853-7036

## **CERTIFICATE OF SERVICE**

Julie Allen, an attorney, hereby certifies that on July 17, 2008, she electronically filed the attached with the Clerk of Court using the CM/ECP system, which will send notification of such filing to the following counsel for Plaintiff:

Mark Burden Donohue, Brown, Mathewson & Smyth 140 South Dearborn Street, Suite 700 Chicago, Illinois 60603

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